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ARIZONA CORPORATION
COMMISSION

GVNW CONSULTING, INC.

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September 24, 2001

Mr. Steve Olea
Acting Director, Utilities
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Dockets

Dear Mr Olea:

Mr. John Hayes of the Table Top Telephone Company (TTTC) has requested that we file TTTC's comments in Docket No. T-00000A-01-0076 directly with your office.

Please direct any questions with regard to this filing to myself or Jack Pendleton on 503.612.4400.

Thank you for your assistance.

Sincerely,

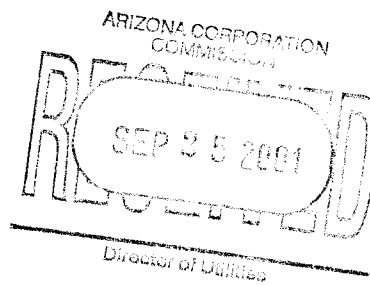
Jeffry H. Smith
Consulting Manager

Arizona Corporation Commission
DOCKETED

SEP 25 2001

Copy to Mr. John Hayes
Mr. Ben Harper, GVNW
Mr. Jack Pendleton, GVNW

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BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF THE GENERIC)	DOCKET NO. T-00000A-01-0076
INVESTIGATION INTO NUMBER)	
RESOURCE OPTIMIZATION AND)	
IMPLEMENTATION OF NUMBER)	
POOLING IN ARIZONA)	

Comments of Table Top Telephone Company, Inc.

Background

In Docket No. T-00000A-01-0076, the Arizona Corporation Commission proposes, *inter alia*, the consolidation of three existing Incumbent Local Exchange Carrier (ILEC) rate centers: Aguila, operated by Table Top Telephone Company, Inc. (TTTC) and Wickenburg and Yarnell, operated by Qwest Corporation (Qwest). The Commission proposes that the three rate centers be consolidated into one proposed consolidated Wickenburg rate center. The order contemplates that all rate centers that currently have the same local calling area be consolidated into one rate center within 12 months of the order.¹ Once rate centers are consolidated, new competitive entrants may only require one new NXX to serve the entire new rate center, rather than the three that would be required by the new entrant to serve the three existing rate centers. This might conserve numbering resources in the future, as well as aid new entrants by allowing them to serve a larger area with a single NXX. Thirteen such proposed consolidations are illustrated in the Order.²

Table Top Telephone Company recommends that the Aguila rate center should not be included in the proposed consolidated Wickenburg rate center. This is not in the best interest of TTTC customers, and may be in conflict with provisions of portions of the Telecommunications Act of 1996 (TA96) that apply to TTTC's Aguila rate center, but not to the involved Qwest exchanges.

¹ ACC Docket No. T00000A-01-0076, Decision No. 63982 at August 30, 2001, Paragraph 46.

² Ibid.

The Proposed Wickenburg consolidation ignores important intercompany issues

Of the thirteen rate center consolidations proposed in the Order, the proposed Aguila – Wickenburg - Yarnell consolidation is the only consolidation involving rate centers operated by different ILECs. Eleven of the proposed consolidations involve only Qwest rate centers, and one involves only Citizens Utilities rate centers. The Wickenburg proposal raises several issues that were not considered fully in the Order. GVNW's initial research has found only one other instance where rate centers operated by different ILECs have been consolidated. This case involved Qwest and Verizon rate centers. Qwest and Verizon are governed by generally the same rules under TA96. However, small rural ILECs, such as TTTC, have different rules under TA96, including the so-called "rural exemption" provisions of the Act that are found in section 251(f), that do not apply to large ILECs such as Qwest and Verizon. Many of the difficulties that will result from a consolidation of TTTC and Qwest rate centers stem from these differences in requirements under TA96.

Local Number Portability Issues

The ACC's order dated August 30, 2001 has not addressed the situation where one wire center in a consolidated rate center has Local number Portability and another does not. Qwest currently has Local Number Portability (LNP) installed in most of its offices. TTTC is not required to deploy LNP until a bona fide request is received, due to the certain provisions of the Telecommunications Act of 1996. If TTTC receives a bona fide request for LNP in Aguila, there are specified procedures for determination of whether LNP is in the public interest. TTTC does not currently have LNP installed, has not received a bona fide request for LNP, and has no plans for LNP at this time.

The Order contemplates that, after rate center consolidation is accomplished, number pooling by thousands block will be implemented to further conserve numbering resources. However, since TTTC does not currently have LNP, there can be no number pooling that would include Aguila. Any savings in number resources that might be realized if all switches in the consolidated rate center have number pooling will not be available for Aguila, and will preclude any order on a consolidated rate center basis.

TTTC believes a consolidated rate center where two different ILECs are involved will cause confusion for potential new entrants, as many of the documents used by telecommunications providers to determine information concerning incumbent arrangements, such as the Local Exchange Routing Guide (LERG), will be ambiguous concerning the proposed consolidated Wickenburg rate center. The resulting confusion and uncertainty may actually be detrimental to introduction of competition in the Wickenburg area.

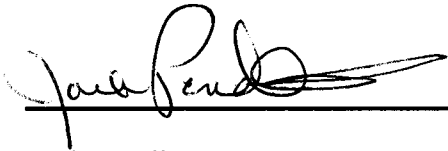
Because TTTC and Qwest are treated differently under the terms of TA96, regulations governing Qwest and TTTC differ. This will affect various issues, some yet unforeseen, when dealing with the consolidated Wickenburg rate center as proposed in the Order. For example, if a competitor seeks Eligible Telecommunications Carrier (ETC) status for the proposed consolidated Wickenburg rate center, the effect on TTTC is unclear. A competitor in Qwest areas is not required to serve the entire Qwest study area to obtain ETC status in parts of Qwest's study area. However, because TTTC is a rural carrier, there is a requirement that a competitor serves the entire TTTC study area prior to being granted ETC status in any portion of TTTC's study area. TTTC also serves four

other exchanges in its Arizona study area, none of which are contiguous to Aguila. It is unclear how a request for ETC status for the proposed consolidated Wickenburg rate center can be addressed in light of this discrepancy in rules governing Qwest and TTTC.

Conclusion

In summary, consolidation of rate centers between different ILECs may well not realize the anticipated savings in number resources and will create confusion in dealing with the consolidated rate center. This confusion may actually be a detriment to competitive entry, rather than promoting competition. In order to resolve many of the discrepancies, TTTC would be required to deploy LNP. The high cost per customer of LNP is not in the best interest of TTTC's customers. For the above stated reasons, TTTC requests that Aguila be excluded from the proposed Wickenburg rate center consolidation.

Respectfully submitted on behalf of Table Top Telephone Company, Inc.



Jack Pendleton
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